

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

1750 Chestnut Street Tower II

April 9, 1985

Director of Nuclear Reactor Regulation
Attention: Ms. E. Adensam, Chief
Licensing Branch No. 4
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Ms. Adensam:

In the Matter of the Application of) Docket Nos. 50-390
Tennessee Valley Authority) 50-391

Please refer to T. M. Novak's letter to H. G. Parris dated March 26, 1985, regarding employee concerns over the adequacy of General Construction Specification (GCS) G-29C as applied to AWS D.1-1 at the Watts Bar Nuclear Plant. Enclosed is TVA's response to the subject letter. Additional information on this subject was provided to the Staff in J. P. Darling's letter to H. R. Denton dated March 28, 1985.

If you have any questions concerning this matter, please get in touch with K. Mali of my staff at FTS 858-2682.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

R. H. Shell

R. H. Shell
Nuclear Engineer

Sworn to and subscribed before me
this 9th day of April 1985

Paulette H. White

Notary Public

My Commission Expires 8-24-88

Enclosure

cc: U.S. Nuclear Regulatory Commission (Enclosure)
Region II
Attn: Dr. J. Nelson Grace, Regional Administrator
101 Marietta Street, NW, Suite 2900
Atlanta, Georgia 30323

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ENCLOSURE
RESPONSE TO NRC LETTER DATED MARCH 26, 1985
CONCERNING THE USE OF AWS D.1-1 AT
WATTS BAR NUCLEAR PLANT

The Staff's understanding of the purpose of the February 10, 1984 meeting held between TVA and NRC representatives is essentially correct, although clarifying details are given below along with responses to specific questions as requested in NRC's letter dated March 26, 1985.

In order to facilitate complete understanding of the nature and extent of the employee concern, the following background is given. The employee concern expressed to TVA management was threefold:

1. Questions concerning the adequacy of the AWS D.1-1 welding program at Watts Bar Nuclear Plant (WBN) were initially documented as open items in TVA's Nuclear Safety Review Staff (NSRS) review reports. After the TVA Office of Quality Assurance (OQA) was established in 1982, responsibility for follow-up to ensure proper disposition of several NSRS open items, including those relating to the AWS welding program at WBN, was transferred from NRSR to OQA. The concerned employee disagreed with the decision to transfer the responsibility for closure, believing that it should have been retained by NSRS. NSRS did participate in the internal evaluations of these open items and in discussions with NRC personnel and concurred with the disposition of those open items.
2. The employee was also concerned that TVA had not provided sufficient details to NRC-NRR defining the differences between General Construction Specification (GCS) G-29C and AWS D.1-1. The employee believed that referencing GCS G-29C in the FSAR was not sufficient, but the document itself should be submitted to NRR under docketed letter. Also, he believed that TVA should pursue a detailed review of GCS G-29C by NRR and request that NRR document the results of that review to preclude questions arising on the AWS welding program at WBN at a later date.
3. Finally, the employee expressed a "differing opinion" regarding the adequacy of GCS G-29C in meeting AWS D.1-1. It was his opinion, based upon observation of practices and patterns at other utilities, that GCS G-29C did not fully meet AWS D.1-1. He did state, however, that if NRC-NRR found no problems after review of GCS G29C, he would no longer have any concern.

NRC Question

- (a) Was the TVA employee raising this concern satisfied with the resolution of this issue as documented in the March 1, 1984 meeting summary?

TVA Response

It was TVA management's belief that the employee's concerns were satisfied as a result of TVA actions on the matter and the February 10, 1984 meeting and resultant meeting summary dated March 1, 1984. However, discussions with the employee on April 2 and 3, 1985, revealed that certain concerns still exist as detailed in the responses to questions (b) and (c) below.

NRC Question

- (b) Was the TVA employee concerned over the adequacy of GCS G-29C as applied to AWS D.1-1, or was he only concerned that the staff may not be aware of its existence?

TVA Response

As discussed in item 3 above, the employee believed GCS G-29C was inadequate based on observations of practices at other utilities. Also, he was concerned that the staff may not have been aware of the details of GCS G-29C in that it was only referenced in the FSAR.

NRC Question

- (c) Is TVA aware of any differing opinion today regarding the adequacy of GCS G-29C as applied to AWS D.1-1?

TVA Response

The same individual discussed previously remains concerned as of this writing. He still is of the opinion that AWS D.1-1 is not being met entirely based on his observations at other utilities. It should be noted that all other TVA personnel involved in the resolution/disposition of the NSRS open items were satisfied with such resolution before the February 10, 1984 meeting with NRR. In accordance with TVA policy of addressing employee concerns, the meeting with NRR was requested to assuage any further concerns the employee had. Also, the employee remains concerned that the NRR may not be fully apprised of the contents of GCS G-29C, even during the February 10, 1984 meeting. Since the NRR summary of the February 10, 1984 meeting did not denote a detailed evaluation of GCS G-29C, he remains concerned that questions could arise later, possibly impacting the WBN licensing schedule.

In summary, TVA believes that the employee's concerns regarding the adequacy of the AWS D.1-1 welding program at WBN have been addressed and satisfactorily resolved. To gain further assurance that they have been resolved, these concerns will be reevaluated and discussed with the concerned employee. This employee is fully aware of his right to express his concerns directly to the NRC regardless of the results of additional TVA evaluations.